



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

RCH/SPN/HDM/CRH  
F. #2018R01309

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 26, 2022

By ECF

The Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Rashid Sultan Rashid Al Malik Alshahhi, et al.  
Criminal Docket No. 21-371 (S-1) (BMC)

Dear Judge Cogan:

The parties respectfully submit this proposed joint agenda for the final pretrial conference in the above-captioned matter scheduled for August 29, 2022, at 9:30 a.m.

- Trial Schedule: The parties seek to confirm the current trial schedule. The parties understand that the Court will be starting voir dire on September 19 and sitting on the following days:
  - September 19, 20, 21, 22
  - September 28, 29 and 30 (starting at 1:15 p.m.)
  - October 3, October 4 (ending at 3:30 or 4 p.m.), October 6, October 7 (starting at 1:15 p.m.)
  - October 11, 12, 13, 14 (starting at 1:15 p.m.)
- Voir Dire: On August 23, 2022, the parties submitted a joint letter listing the jurors that both parties agree should be struck for cause based on their written responses on the juror questionnaires. On August 26, 2022, the parties separately submitted proposals for the Court to consider with respect to the remaining jurors. The parties seek to confirm how the Court intends to proceed with voir dire, how potential jurors showing up will be ordered, the number of peremptory strikes and manner to use them.
- Outstanding Motions: There are several pending motions before the Court, including several fully briefed motions (the defendants' motion for severance and the defendants' motions for Rule 17 subpoenas), and several motions that are not yet fully briefed (the

defendants' motions in limine, the defendants' motions to exclude the governments' experts and the governments' motions in limine).

- Space in Courthouse: Defendants would request if available the use of workrooms in the courthouse (as that has been done in other complex cases, where, as here, the defendants are managing significant documentation in exhibits, 3500 material and other documents).
- Technology for Courtroom: The parties request time in the week of September 12 to set up courtroom technology for the presentation of evidence, and we request guidance on coordination with Your Honor's deputy.

Respectfully submitted,

BREON PEACE  
United States Attorney

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cc: Counsel for Thomas Joseph Barrack (by ECF)  
Counsel for Matthew Grimes (by ECF)  
Clerk of the Court (BMC) (by ECF)